

**United States Department of the Interior
Bureau of Land Management**

**Determination of NEPA Adequacy
DOI-BLM-UT-G020-2016-0025-DNA**

May, 2016

San Rafael Commercial Filming

Location: *Black Dragon Wash Trail, Ding and Dang Canyons,
Chute Canyon and Crack Canyon*

Applicant/Address: *Seacat Creative
7 S. Tracy
Bozeman, MT 59715*

U.S. Department of the Interior
Bureau of Land Management
Green River District, Price Field Office
125 S 600 W
Price, Utah 84501
Phone: (435) 636-3600
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Worksheet

Determination of NEPA Adequacy

U.S. Department of the Interior
Utah Bureau of Land Management

The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

OFFICE: Price Field Office

TRACKING NUMBER: DOI-BLM-UT-G020-2016-0025-DNA

FILE/SERIAL NUMBER: UTU-91662

PROPOSED ACTION TITLE / TYPE: San Rafael Commercial Filming / Film Permit

LOCATION/LEGAL DESCRIPTION: *Black Dragon Wash Trail, Ding and Dang Canyons, Chute Canyon and Crack Canyon*

APPLICANT: Seacat Creative

A. Description of the Proposed Action and Any Applicable Mitigation Measures

On April 19, 2016, Kate Siberell, on behalf of Seacat Creative, filed a film permit application for two days of still photography and video filming from May 5 through May 6, 2016, on BLM managed land. The company proposes to photograph areas in the San Rafael Desert for their clients in the outdoor industry. The filming cast and crew consist of 5-6 people and the filming would consist of camping at Black Dragon Wash, biking the Black Dragon Wash Trail, hiking existing trails in Ding and Dang Canyons and/or Chute and Crack Canyons. There would be 2 crew transportation vehicles. The cameras would be hand held or on a tripod; there would be no set construction, no lighting rigs, and no generators or machinery used by the filming crew. Filming would consist of clients personal tents, coolers, kitchen utensils, multi-tools, camp lanterns, drink-wear, apparel, etc. The flow of other recreational activities would not be disrupted. Camping would take place one night at a designated site in the Wedge Campground, and the rest at Goblin Valley State Park.

The proposed filming locations are within, or adjacent to, the Crack Canyon and Sids Mountain Wilderness Study Areas (WSA). In 2006 an Environmental Assessment for *No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument* (UT-USO-06-004) was written. This proposal conforms to the criteria for No-Impact Commercial Filming in that document. It also meets the non-impairment standard defined in the Bureau of Land Management (BLM) Handbook H-8550-1. During the development of the UT-USO-06-004-EA, the BLM made diligent efforts to invite and solicit comments from the affected and interested public. Copies of the EA were mailed to the Southern Utah Wilderness Alliance, the Utah Chapter of the Sierra Club, and the Wilderness Society. No comments were received.

B. Land Use Plan (LUP) Conformance

LUP Name: Price Field Office Record of Decision & Approved Resource Management Plan

Date Approved: October 2008

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):

Page 115 of the Price Field Office RMP reads as follows: *"Maintain availability of public lands to meet the habitation, cultivation, trade, mineral development, recreation, and manufacturing needs of external customers and the general public"* and decision LAR-5, which states *"Permit commercial filming on a case-by-case basis subject to a NEPA process."*

C. Identify the applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action:

- No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (UT-USO-06-004-EA).
- The Federal Land Policy and Management Act of 1976 (Public Law 94-579, as amended) (FLPMA) augmented by Public Law 106-206, authorizes the BLM to regulate commercial filming activities on Federal lands.
- Existing WSAs are managed under the BLM's Manual 6330, and guidelines for Lands Under Wilderness Review (BLM Handbook H-8550-1). The major objective of the policy is to manage lands under wilderness review in a manner that does not impair their suitability for designation as wilderness. In general, the only activities permissible under the policy are temporary uses that do not create surface disturbance or involve permanent placement of structures. Manual 6330 states that: *Any permit or lease issued under 43 CFR 2920 must contain a stipulation that if the WSA is designated as a wilderness area, the lease or permit may be terminated, and Commercial filming may be permitted under 43 CFR 2920 if it is determined to meet the non-impairment standard or one of the exceptions.*
- As defined by the National Historic Preservation Act (NHPA), the proposed action is an undertaking. However, in accordance with the implementing regulations set forth at 36 CFR 800.3(a)(1), the proposed action has no potential to cause effects to historic properties, even assuming that historic properties might be present. Therefore, beyond documenting a finding of *no potential to cause effects*, no additional efforts are required in order to comply with Section 106 of NHPA. Additionally, in accordance with the Utah Protocol which may be followed by the Price Field Office, Section VII.C.1 provides additional exemption from further compliance efforts. This action is in conformance with the NHPA and no further compliance efforts are required.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

☒ Yes

☐ No

Documentation of answer and explanation:

The UT-USO-06-004-EA analyzed and described the resource values that could be affected by proposed filming within Wilderness Study Areas and the Grand Staircase-Escalante National Monument. The criteria for No-Impact Commercial Filming in this EA are as follows:

The cameras would be hand held or on a tripod. There would be no removal of vegetation or soils; no use of dollies, tracks, cranes, high lines, or other major camera support devices or platforms; no construction of movie sets; no use of props or artificial lighting; no use of explosives, pyrotechnics, or fires by the filming crew; no climbing (or the appearance of climbing) on natural bridges or arches, in archaeological sites, or within breeding habitats of threatened or endangered species. There would be no use of exotic species. The filming proposal does not contain any of the above mentioned conditions. Public access would not be restricted as a result of these no-impact commercial filming activities. The flow of other recreational activity would not be disrupted.

As analyzed by the EA, the duration of filming in any one location would be less than 10 days, with the typical time being an average of 1-3 days. The total number of personnel associated with this type of filming would typically be 5 or fewer people. The filming proposal by Seacat Creative involves 5-6 people and entails 2 days of filming. Dispersed camping is allowed at Black Dragon by the general public, the filming crew is not anticipated to have more impact than the general public.

The proposal has been screened by the interdisciplinary team to ensure it meets the non-impairment standard.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action (or existing proposed action), given current environmental concerns, interests, and resource values?

☒ Yes

☐ No

Documentation of answer and explanation:

The alternatives considered in the UT-USO-06-004-EA, dated September 6, 2006, are appropriate given the detailed response to identified issues and the analysis targeted to protection of resource values that may be affected by the proponent's filming. Within the UT-USO-06-004-EA the BLM analyzed two alternatives, the Proposed Action and the No Action. Within the range of alternatives considered in the UT-USO-06-004-EA the BLM included mitigation measures to minimize impacts to resources of interest/concern. The UT-USO-06-004-EA effectively analyzed and disclosed any known potential impacts to resources of interest/concern. No significant new information or circumstances have been identified by the interdisciplinary team review, for any of these resources which would render the existing analysis inadequate for approving the filming application.

3. Is existing analysis adequate in light of any new information or circumstances (such as, rangeland health standards assessment; recent endangered species listings, updated list of BLM sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

☒ Yes

☐ No

Documentation of answer and explanation:

The UT-USO-06-004-EA effectively analyzed and disclosed any known potential impacts to the resources of interest/concern. No significant new information or circumstances have been identified by the interdisciplinary team review, for any of these resources which would render the existing analysis inadequate for approving the filming project.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

☒ Yes

☐ No

Documentation of answer and explanation:

The UT-USO-06-004-EA included a comprehensive environmental analysis of the direct, indirect, and cumulative impacts of filming in WSAs. The UT-USO-06-004-EA analyzed up to 50 applications per year for no-impact filming in WSAs. The one filming proposal addressed in this DNA is part of the 50 proposals addressed and conceptually analyzed in the UT-USO-06-004-EA. The PFO previously analyzed and approved 2 filming permits in WSAs this fiscal year. No significant new information or circumstances have been identified by the interdisciplinary team review, which would render the existing analysis inadequate for approving the filming permit.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

☒ Yes

☐ No

Documentation of answer and explanation:

During the development of the UT-USO-06-004-EA the BLM made diligent efforts to invite and solicit comments from the affected and interested public. Copies of the EA were mailed to the Southern Utah Wilderness Alliance, the Utah Chapter of the Sierra Club and the Wilderness Society. Notice of the proposed action was posted on the Utah ENBB on May 8, 2006. The comment period was open from May 8, 2006 through June 7, 2006. No comments were received.

E. Persons/Agencies/BLM Staff Consulted:

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Jake Palma	Environmental Coordinator	NEPA, Environmental Justice, Socio-Economics
Connie Leschin	Realty Specialist / Project Lead	Lands / Access
Michael Wolfe	Archeologist	Native American Consultation, Cultural Resources
Matt Blocker	Outdoor Recreation Planner	BLM Natural Areas, National Trails and Backways, Wild and Scenic Rivers, Wilderness, Recreation
Josh Winkler	Outdoor Recreation Planner	ACEC, Visuals, Recreation
Karl Ivory	Rangeland Management Specialist	Vegetation, Livestock, Rangeland Health
Stephanie Bauer	Rangeland Management Specialist	Invasive Species / Noxious Weeds, Woodlands / Forestry
Michael Leschin	Geologist/Paleontology	Paleonotology
John Pell	Fire	Fuels / Fire Management
Mike Tweddell	Range Management Specialist	Wild Horses & Burros
Jared Reese	Wildlife Biologist	T & E, BLM Sensitive, Migratory Birds, Non-USFWS Designated, Wildlife
Mike Glasson	Geologist	Geology / Minerals / Energy Production
Jeff Brower	Hydrologist	Air Quality, Farmlands, Floodplains, Water Quality, Wetland / Riparian, Soils, Wastes,

CONCLUSION

Plan Conformance:

- ☒ This proposal conforms to the applicable land use plan.
- ☐ This proposal does not conform to the applicable land use plan.

Determination of NEPA Adequacy

- ☒ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.
- ☐ The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.

Connie Luschin
Signature of Project Lead

4/28/16
Date

Jacob [Signature]
Signature of NEPA Coordinator

4/28/16
Date

[Signature]
Signature of the Responsible Official

4/28/16
Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: San Rafael Commercial Filming

NEPA Log Number: DOI-BLM-UT-G020-2016-0025-DNA

File/Serial Number: UTU-91662

Project Leader: Connie Leschin

DETERMINATION OF STAFF: *(Choose one of the following abbreviated options for the left column)*

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for relevant impact that need to be analyzed in detail in the EA

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form. The Rationale for Determination column may include NI and NP discussions.

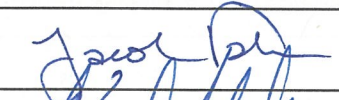

Determination	Resource/Issue	Rationale for Determination	Signature	Date
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)				
NI	Air Quality & Greenhouse Gas Emissions	<p>Emissions from earth-moving equipment, vehicle traffic, drilling and completion activities, separators, oil storage tanks, dehydration units, and daily tailpipe and fugitive dust emissions could adversely affect air quality.</p> <p>No standards have been set by the EPA or other regulatory agencies for greenhouse gases. In addition, the assessment of greenhouse gas emissions and climate change is still in its earliest stages of formulation. Global scientific models are inconsistent, and regional or local scientific models are lacking so that it is not technically feasible to determine the net impacts to climate due to greenhouse gas emissions. It is anticipated that greenhouse gas emissions associated with this action and its alternative(s) would be negligible.</p>	Karl Ivory	04/25/16
NC	BLM natural areas	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to BLM natural areas.	Matt Blocker	4/28/16
NI	Cultural Resources	There is no potential for direct impacts to cultural resources from the proposed action.	Michael Wolfe	04/25/16
NI	Cultural: Native American Religious Concerns	No Native American concerns are known in the project area, and none have been noted by Ute tribal authorities. Recent consultations with tribal authorities have indicated that consultation is not desired for projects that have no potential to affect known cultural sites. Should future inventories or consultations with tribal authorities reveal the existence of sensitive properties, appropriate mitigation and/or protection measures may be undertaken.	Michael Wolfe	04/25/16
NP	Designated Areas: Areas of Critical Environmental Concern	After review of the Price Field Office RMP and GIS there are no ACECs present within the proposed action.	Josh Winkler	04/25/16

Determination	Resource/Issue	Rationale for Determination	Signature	Date
NC	Designated Areas: National Trails and Backways	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to National Trails and Backways	Matt Blocker	4/28/16
NC	Designated Areas: Wild and Scenic Rivers	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to Wild and Scenic Rivers	Matt Blocker	4/28/16
NC	Designated Areas: Wilderness Study Areas	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to Wilderness Study Areas	Matt Blocker	4/28/16
NI	Environmental Justice	No minority or economically disadvantaged communities or populations would be disproportionately adversely affected by the proposed action or alternatives.	Jacob Palma	04/25/16
NI	Farmlands (prime/unique)	No prime or unique farmlands, as identified by the NRCS, based on soil survey data for the county are located in the project area; therefore, this resource will not be carried forward for analysis.	Karl Ivory	04/25/16
NI	Fuels/Fire Management	No fuel management activities planned for the project area. The proposed project would not conflict with fire management activities. Any campfires shall be in authorized fire rings. Fires shall be completely extinguished.	Stephanie Bauer	04/28/2014
NC	Geology / Minerals / Energy Production	The filming permit does not include surface disturbing activity, damage to unique geologic features, or conflicts with locatable or salable mineral operation, are not expected.	Michael Leschin	04/25/16
NC	Lands/Access	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to Lands and Access.	Connie Leschin	4/19/16
NC	Lands with wilderness characteristics	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to lands with wilderness characteristics	Matt Blocker	4/28/16
NI	Livestock Grazing	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to Livestock Grazing	Karl Ivory	04/25/16
NC	Paleontology	The proposed activities would have no direct impacts to paleontological resources and a negligible potential for secondary impacts should the filming area become more popular for visitors as a result of the filming.	Michael Leschin	04/25/16
NI	Vegetation: BLM Sensitive	There are known BLM Sensitive plant species populations within the project area. There are no proposed activities that would impact the BLM sensitive plant species habitat or populations.	Karl Ivory	04/25/16

Determination	Resource/Issue	Rationale for Determination	Signature	Date
NI	Vegetation: Invasive Species / Noxious Weeds	Ground disturbing activities associated with the proposed action is minimal, therefore impacts to invasive species/noxious weeds will be negligible. There is still the risk of introducing noxious weeds or invasive species carried on equipment, vehicles, or clothing, but generally not a significant addition to existing risks of impacts. It is recommended that permit stipulations include weed prevention measures such as inspecting and cleaning equipment and vehicles and inspecting clothing and other animals for vegetation matter and seeds prior to entering BLM administered lands. By following the stipulations on the permit, the possibility of introducing or spreading invasive species/noxious weeds in the project area will be greatly reduced.	Stephanie Bauer	04/25/16
NI	Vegetation: Threatened, Endangered, Proposed, or Candidate	There are known threatened plant species populations within the project area. There are no proposed activities that would impact the threatened plant species habitat or populations.	Karl Ivory	04/25/16
NI	Vegetation: Vegetation Excluding USFW Designated Species and BLM Sensitive Species	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to Vegetation	Karl Ivory	04/25/16
NI	Vegetation: Wetland/Riparian	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to Wetlands and Riparian Areas	Karl Ivory	04/25/16
NI	Vegetation: Woodlands/Forest ry	There are no merchantable woodlands/forestry products within the project area.	Stephanie Bauer	04/25/16
NI	Rangeland Health Standards	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to Rangeland Health Standards	Karl Ivory	04/25/16
NC	Recreation	The analysis contained in EA UT-USO-06-004 adequate addresses the impacts to lands within the SRMA and National Historic Landmarks.	Josh Winkler	04/25/16
NI	Socio-Economics	No impact to the social or economic status of the county or nearby communities would occur from this project due to its small size in relation to ongoing development throughout the PFO.	Jacob Palma	04/25/16
NI	Soils	No impact photography would not impact soils because no disturbance is anticipated.	Karl Ivory	04/25/16
NC	Visual Resources	The analysis contained in EA UT-USO-06-004 adequate addresses the impacts to VRM I found within the proposed action.	Josh Winkler	04/25/16

Determination	Resource/Issue	Rationale for Determination	Signature	Date
NI	Wastes (hazardous/solid)	No chemicals subject to reporting under SARA Title III will be used, produced, stored, transported, or disposed of annually in association with the project. Furthermore, no extremely hazardous substances, as defined in 40 CFR 355, in threshold planning quantities, will be used, produced, stored, transported, or disposed of in association with the project. Trash would be confined in a covered container and disposed of in an approved landfill. No burning of any waste will occur due to this project. Human waste will be disposed of in an appropriate manner in an approved sewage treatment center.	Karl Ivory	04/25/16
NI	Water: Floodplains	No activities are planned that would have any impact to floodplains or waterways.	Karl Ivory	04/25/16
NI	Water: Groundwater Quality	No subsurface activities are planned with this project	Karl Ivory	04/25/16
NI	Water: Hydrologic Conditions (stormwater)	No ground disturbing activities are planned with this project.	Karl Ivory	04/25/16
NI	Water: Surface Water Quality	No activities are planned that would have any impact to floodplains or waterways.	Karl Ivory	04/25/16
NP	Wild Horse / Burro	The proposed action is not within a WH&B Herd Management Area	Jason Carlile	04/25/16
NC	Wildlife: BLM Sensitive	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to BLM sensitive species.	Jared Reese	04/25/16
NC	Wildlife: Migratory Birds (including raptors)	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to migratory birds.	Jared Reese	04/25/16
NC	Wildlife: Non-USFWS Designated	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to wildlife	Jared Reese	04/25/16
NC	Wildlife: Threatened, Endangered, Proposed or Candidate	The analysis contained in EA UT-USO-06-004 adequately addresses the impacts to threatened, endangered, proposed or candidate species.	Jared Reese	04/25/16

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator		4/28/16	
Authorized Officer		4/28/16	

MINIMUM IMPACT FILMING CHECKLIST

Price Field Office

Applicant: Seacat Creative

Project: San Rafael Commercial Filming

Type of Filming: Movie _____ Still X Video/DVD X Pilot TV Series _____

I. This section applies to all BLM-managed lands.	YES*	NO
A. Will impact sensitive habitat or species		X
B. Will impact Native American sacred site		X
C. Involves major use of pyrotechnics		X
D. Involves more than minimum impacts to land, air, or water		X
E. Involves use of explosives		X
F. Involves use of exotic species with danger of introduction into the area		X
G. Involves use of heavy equipment		X
H. Involves aircraft (helicopter, fixed-wing, or hot air balloon) and was determined to not be minimally impacting in part II.		X
I. Involves surface disturbance or adverse impact to sensitive surface resource values or does not meet standards mandated by law, regulation or policy for resources including, but not limited to:		
1. Historical, cultural or paleontological sites		X
2. Sensitive soils		X
3. Areas of Critical Environmental Concern (ACEC)		X
4. Wetlands or riparian areas		X
5. Wild & Scenic River corridors		X
6. National Register Sites		X
7. Designated wilderness, WSAs, or BLM Natural Areas		X

* If "yes" was marked in any one category, the action is not minimally-impacting.

II. Aircraft Screening	YES*	NO
1. Use of aircraft (helicopter, fixed wing, hot air balloon) involves refueling in a sensitive area		X
2. Use of aircraft is proposed in an area with wildlife concerns during a critical period and a) is proposed for more than 1 day or		X
b) exceeds the frequency of 2 projects per 30-day period		X
3. Use of aircraft is proposed in an area with no wildlife concerns and a) is proposed for more than 2 days or		X
b) exceeds the frequency of 3 projects per 30-day period		X
4. Use of aircraft is proposed within ½ mile of a designated campground located in a sensitive area and the number of low-elevation passes proposed exceeds 4 passes per day.		X

* If "yes" was marked in any one category, the action is not minimally-impacting.

FILM PERMIT STIPULATIONS
UTU-91662

GENERAL

All vehicles will remain on designated roads, trails, and turnouts. Parking of vehicles will only occur on existing disturbed pull outs, not untrammeled landscape.

All vehicles, including Jeeps, mountain bikes, and motorbikes, will remain on the roads and trails authorized by the BLM permits, and previously-existing road turnouts and parking areas. The vehicles used for this project will be power-washed prior to entering the project area, to remove any mud and/or seeds.

Any campfires shall be within an approved fire ring and completely extinguished before the crew leaves the site.

The company will provide the BLM Price Field Office with a current schedule for filming on the National System of Public Lands. The BLM contact person is Connie Leschin (435) 636-3610.

The company will have a copy of the BLM film permit at all times when filming in the BLM locations.

If any of the crew encounters archaeological sites, they shall not disturb those areas, and shall avoid them to the extent possible. No collecting of archaeological artifacts by the crew will be allowed.

If footage is recorded that discloses the presence of archaeological sites or artifacts, to the extent possible that footage shall not be shown on public television.

The final filming product will have written and/or verbal acknowledgment of filming location on the National System of Public Lands managed by the Bureau of Land Management, Price Field Office, Utah, if feasible.

If the WSA is designated as a wilderness area, the permit may be terminated.

CHUTE & CRACK CANYONS EASTERN SAN RAFAEL REEF

Tom's Utah Canyoneering Guide

www.CanyoneeringUSA.com

Chute Butte

Canyon

Behind the Reef Road

Crack Canyon Park

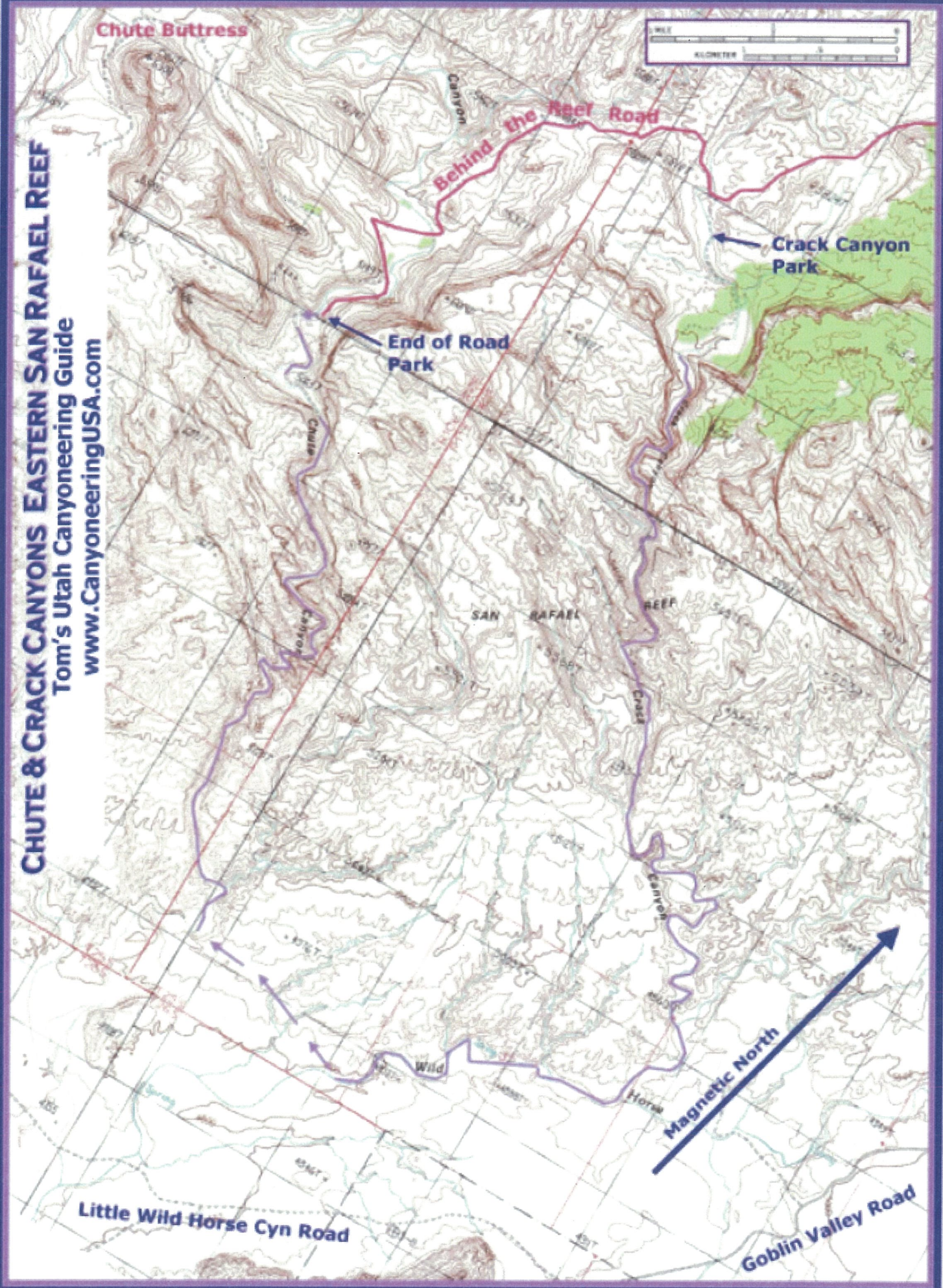
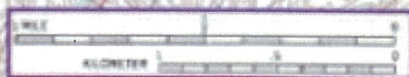
End of Road Park

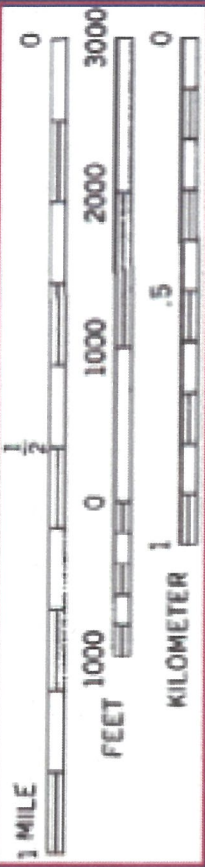
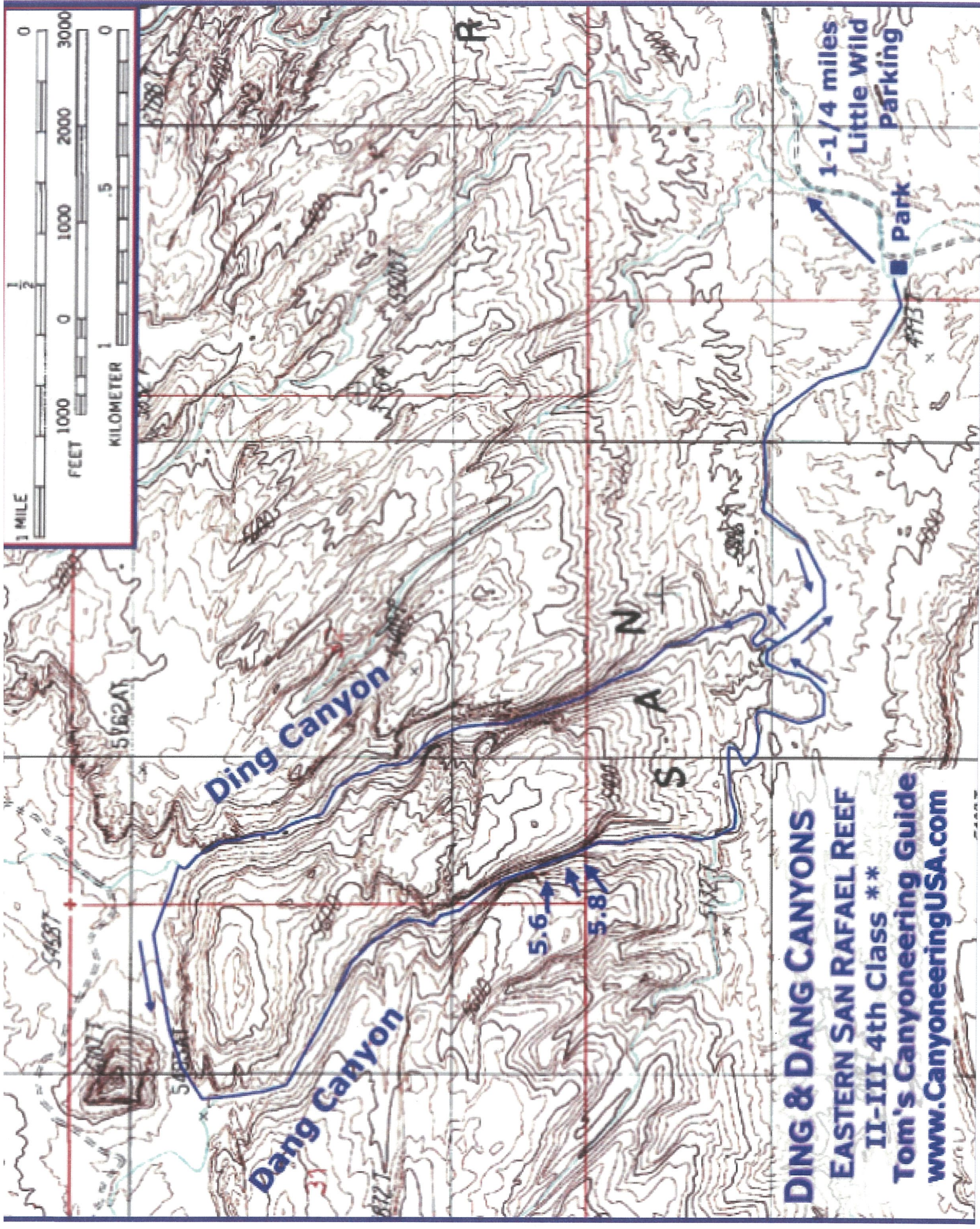
SAN RAFAEL REEF

Magnetic North

Little Wild Horse Cyn Road

Goblin Valley Road





DING & DANG CANYONS
EASTERN SAN RAFAEL REEF
II-III 4th Class **
Tom's Canyoneering Guide
www.CanyoneeringUSA.com

